

## REMARKS

Claim 15 has been cancelled and claims 7, 9, 11, 14, 17, 19 and 22-24 have been amended. Claims 7-14 and 16-25 remain for further consideration. No new matter has been added.

The objections and rejections shall be taken up in the order presented in the Official Action.

1. Claims 7-14 and 16-25 remain following entry of this amendment.
2. The undersigned attorney authorizes the change to RFC 1918 to be made via Examiner's amendment. If an Examiner's amendment is not possible, please contact the undersigned and we promptly submit the necessary corrections.
3. Claims 9, 11, 17, 19 and 22-24 currently stand objected to for several informalities. Claims 9, 11, 17, 19 and 22-24 have been amended.
- 4-16. Claims 7-10, 12, 14-18 and 20 currently stand rejected under 35 U.S.C. §102(e) for allegedly being anticipated by the subject matter recited in U.S. Patent 6,101,499 to Ford (hereinafter "Ford").

### Claim 7

Claim 7 recites a method that includes "manipulating the first address of each device in accordance with a mathematical formation algorithm to derive the second address which uniquely identifies each such device in the second network." (emphasis added, cl. 7). The

Official Action contends that Ford discloses the claimed method. Specifically, the Examiner alleges that Ford's address formulation algorithm manipulates the first address in two ways comprising of first, hashing the first address, then combining this hashed value with a network identifying portion to create a second address. (see Official Action, pg. 4). It is respectfully submitted that this rejection is improper.

A fair and proper reading of Ford reveals that Ford does not use the first address as part of its disclosed manipulation (hashing) process to derive the second address. Ford's IP address comprises two portions: (i) a network identifying portion, and (ii) a host identifying portion (col. 2, lines 18-20; col. 7, lines 11-13). The network identifying portion is taught by Ford to be the value of "10" (col. 3, lines 39-46; col. 7, line 62 to col. 8, line 5, and col. 8, lines 51-54). The host identifying portion is taught by Ford to start with the IEEE 802 Ethernet address found in the network interface card, and then this address is used with a deterministic hashing function to generate the host identifying portion (col. 3, lines 56-61; col. 8, lines 66 to col. 9, line 9). In Ford, the step of generating the host identifying portion is independent of the step of generating the network identifying portion. Specifically, a fair and proper reading of Ford indicates that there is no disclosure to use the network identifying portion to generate the host identifying portion.

A 35 U.S.C. §102 rejection requires that a single piece of prior art disclose each and every feature of the claimed invention. It is respectfully submitted that Ford is incapable of anticipating the claimed invention since it fails to disclose, amongst other things, "manipulating the first address of each device in accordance with a mathematical formation algorithm to derive the second address which uniquely identifies each such device in the second network." (emphasis added, cl. 7).

### **Claims 8-13**

It is respectfully submitted that the rejection of these dependent claims is moot, since each of these claims depends either directly or indirectly from claim 7, which is patentable for at least the reasons set forth above.

### **Claim 14**

As amended, claim 14 recites a first network that can be linked to a second network, wherein the first network comprises communicably coupled network devices each having an associated first address that uniquely identifies each device in the first network. In addition claim 14 recites:

“wherein each device of the first network also has an associated second address that uniquely identifies each such device in the second network to which the first network is linked, wherein the second address is derived by manipulating the first address of each device in accordance with a mathematical formation algorithm.” (emphasis added, cl. 14)

In contrast, Ford does not use the first address as part of its disclosed manipulation (hashing) process to derive the second address. Ford’s IP address comprises two portions: (i) a network identifying portion, and (ii) a host identifying portion (col. 2, lines 18-20; col. 7, lines 11-13). The network identifying portion is taught by Ford to be the value of “10” (col. 3, lines 39-46; col. 7, lines 62-67 to col. 8, lines 1-5, lines 51-54). The host identifying portion is taught by Ford to start with the IEEE 802 Ethernet address found in the network interface card (NIC), and then use this address with a deterministic hashing function to generate the host identifying portion (col. 3, lines 56-61; col. 8, lines 66-67 to col. 9, lines 1-9). So Ford uses the Ethernet address found in

the NIC to generate the host identifying portion – Ford does not use the network identifying portion “10” to generate the host identifying portion.

#### **Claims 16-21**

It is respectfully submitted that the rejection of these dependent claims is moot, since each of these claims depends either directly or indirectly from claim 14, which is patentable for at least the reasons set forth above.

**17-21.** Claims 11 and 19 currently stand rejected for allegedly being obvious in view of the combined subject matter disclosed in Ford and the MOST Specification Framework Rev. 1.1 [“MOST spec”].

It is respectfully submitted that the rejection of these claims is moot, since their associated independent claim is patentable for at least the reasons set forth above.

**22-25.** Claims 13 and 21 currently stand rejected for allegedly being obvious in view of the combined subject matter disclosed in Ford, the MOST specification and U.S. Patent 6,163,843 to Inoue (hereinafter “Inoue”).

It is respectfully submitted that the rejection of these claims is moot, since their associated independent claim is patentable for at least the reasons set forth above.

**26-28.** Claim 22 currently stands rejected for allegedly being obvious in view of the combined subject matter disclosed in the MOST Specification and Ford.

Claim 22 recites a multimedia system for implementation in a vehicle. The system includes:

“a plurality of multimedia devices communicably coupled through a communication link to form a private Media Oriented System Transport (MOST) network, wherein each of said plurality of multimedia devices has associated therewith a first address that uniquely identifies each said multimedia device in the MOST network, and wherein a each of said plurality of multimedia devices has associated therewith a second address that uniquely identifies each said multimedia device in the public network, wherein the second address is derived based on the first address.” (emphasis added)

Neither the MOST Specification nor Ford discloses nor suggests deriving the second address based upon the first address as set forth in claim 22. As set forth above with respect to claim 7 and 14, Ford does not disclose, nor suggest, generating the second address based upon the first address. Ford uses the Ethernet address found in the NIC to generate the host identifying portion – Ford does not use the network identifying portion “10” to generate the host identifying portion. In addition, the Official Action recognizes that the MOST specification neither discloses nor suggests generating the second address based upon the first address (see Official Action, last ¶ on page 8). Accordingly, even if the MOST Specification and Ford were properly combinable, the resultant combination still fails to disclose that the second address is derived based upon the first address.

**29-32.** Claims 23-25 currently stand rejected for allegedly being obvious in view of the combined subject matter disclosed in the MOST Specification, Ford and Inoue.

It is respectfully submitted that the rejection of these claims is also moot, since their associated independent claim is patentable for at least the reasons set forth above.

For all the foregoing reasons, reconsideration and allowance of claims 7-14 and 16-25 is respectfully requested.

If a telephone interview could assist in the prosecution of this application, please call the undersigned attorney.

Respectfully submitted,

A handwritten signature in cursive script, reading "Patrick O'Shea", is written over a horizontal line.

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